

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
TYISHA L. HATCHER :
: **CASE NO.: 1:18-bk-00019-HWV**

**MOTION BY DEBTOR/ MOVANT TO DELAY CLOSING OF
CASE WITHOUT A DISCHARGE**

AND NOW COME, Tyisha L. Hatcher, Debtor/Movant, by and through her attorneys, Jacobson, Julius & Harshberger, and aver the following:

1. This bankruptcy case was commenced by a petition filed by Debtors/Movant under Chapter 13 of the United States Bankruptcy Code on January 4, 2018.
2. Counsel is trying to obtain the Debtor Education Course certificate from the Debtor in order to file the Certification About a Financial Management Court (Form 423) with the bankruptcy court. Unfortunately, debtor has had difficulty completing the same. New counsel is working with Debtor to ensure the counseling is completed. The filing of the document would allow the Debtor to receive a discharge.
3. Counsel requests thirty days for Debtor to complete the second credit counseling course and file Form 423 with the court.

WHEREFORE, Debtor/Movant requests that the closing of the Debtor's case without a discharge be delayed by thirty days.

Dated: September 14, 2022

/s/Chad J. Julius
Chad J. Julius
ID # 209496
Attorney for Debtor/Movant

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CERTIFICATE OF SERVICE

I, Dera Shade, paralegal with the Jacobson, Julius & Harshberger, hereby certify that I have served a copy of the foregoing *Motion to Delay Closing of Case* on the following person(s) by CM/ECF or by depositing a true and correct copy in the United States Mail, Postage Prepaid addressed to:

JACK N ZAHAROPOULOS ESQUIRE
CHAPTER 13 TRUSTEE
TWecf@pamd13trustee.com

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/s/Dera Shade
Dera Shade, Paralegal
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Dated: September 14, 2022

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ORDER

Upon consideration of Debtor's Motion to Delay Discharge for thirty (30) days it is hereby ORDERED that the Motion is granted. Debtor's case will not be closed without a discharge prior to October 14, 2022.